

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE NON-JUDICIAL CIVIL FORFEITURE :
PROCEEDING REGARDING \$39,347 & : STIPULATION AND ORDER
\$127,935 IN UNITED STATES CURRENCY :
AND \$99,395 IN ASSORTED JEWELRY : 24 Misc.198
SEIZED ON OR ABOUT NOVEMBER 16, 2023 :
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WHEREAS, on or about November 16, 2023, the Drug Enforcement Administration (“DEA”) seized \$39,347 in United States currency, \$127,935 in United States currency, and assorted jewelry with an approximate value of \$99,395 (collectively, the “Seized Property”) from Giomar Roberto Reyes (the “Claimant”) at his residence located in White Plains, New York 10601, and the DEA initiated an administrative forfeiture proceeding against the Seized Property, pursuant to Title 21, United States Code, Section 881, by timely sending written notice of its intent to forfeit the Seized Property to all known interested parties;

WHEREAS, on January 25, 2024, the DEA received a claim from the Claimant asserting an interest in the Seized Property;

WHEREAS, the DEA subsequently referred the matter to the United States Attorney’s Office for judicial forfeiture;

WHEREAS, no other party has claimed an interest in the Seized Property;

WHEREAS, Title 18, United States Code, Section 983(a)(3)(A) provides that, “not later than 90 days after a claim has been filed, the Government shall file a complaint for forfeiture in the manner set forth in the Supplemental Rules for Certain Admiralty and Maritime Claims or return the property pending the filing of a complaint, except that a Court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties”;

WHEREAS, pursuant to title 18, United States Code, Section 983(a)(3), the United States was required to file a civil complaint to forfeit the Seized Property no later than April 24, 2024;

WHEREAS, the Claimant, through counsel, Lance Lazzaro, Esq. has consented to a 30-day extension of the deadline for the Government to file a complaint against the Seized Property;

WHEREAS, Lance Lazzaro, Esq., attorney for the Claimant, represents and warrants that he is authorized to execute this Stipulation on behalf of his client, Giomarte Roberto Reyes; and

WHEREAS, the Government requests an extension of 30 days to file a complaint from April 24, 2024 to May 24, 2024;

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NOW, THEREFORE, IT IS HEREBY ORDERED, upon agreement of the aforementioned parties and pursuant to Title 18, United States Code, Section 983(a)(3)(A), that the time in which the Government is required to file a complaint for forfeiture of the Seized Property is extended from April 24, 2024, up to and including May 24, 2024.

AGREED AND CONSENTED TO:

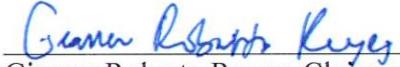
DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: 

Jared D. Hoffman
Assistant United States Attorney
50 Main Street, Suite 1100
White Plains, New York 10601
(914) 993-1928

4/24/2024

DATE

By: 

Giomar Roberto Reyes, Claimant

4/23/2024

DATE

By: 

Lance Lazzaro, Esq.
Attorney for Claimant
Lazzaro Law Firm
360 Court Street, Suite 3
Brooklyn, New York 11231
(718)-488-1900

4/23/2024

DATE

SO ORDERED:

UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK

DATE